

Lesley E. Weaver (SBN 191305)
BLEICHMAR FONTI & AULD LLP
555 12th Street, Suite 1600
Oakland, CA 94607
Tel.: (415) 445-4003
Fax: (415) 445-4020
lweaver@bfalaw.com

Derek W. Loeser (admitted *pro hac vice*)
KELLER ROHRBACK L.L.P.
1201 Third Avenue, Suite 3200
Seattle, WA 98101
Tel.: (206) 623-1900
Fax: (206) 623-3384
dloeser@kellerrohrback.com

Plaintiffs' Co-Lead Counsel

Additional counsel listed on signature page

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

IN RE: FACEBOOK, INC. CONSUMER
PRIVACY USER PROFILE LITIGATION

MDL No. 2843
Case No. 18-md-02843-VC

This document relates to:

ALL ACTIONS

**DECLARATION OF DEREK W. LOESER
IN SUPPORT OF ADMINISTRATIVE
MOTION TO FILE UNDER SEAL**

Judge: Hon. Vince Chhabria
Courtroom 4, 17th Floor
Hearing Date: TBD
Hearing Time: TBD

I, Derek W. Loeser, declare and state as follows:

1. I am a partner at the law firm of Keller Rohrbach L.L.P. and am Co-Lead Counsel for Plaintiffs in the above-captioned matter.

2. I have personal knowledge of the facts set forth herein and, if called as a witness, could and would testify competently to them.

3. This declaration is made in support of Plaintiffs' Administrative Motion to File Under Seal:

- Limited portions of paragraphs in Section II.C. in Plaintiffs' Opposition to Defendant Facebook, Inc.'s Request to Enforce the Partial Stay of Discovery in Pretrial Order No. 20 and Cross-Motion to Compel Discovery Related to Requests for Production Nos. 9 through 13 ("Plaintiffs' Opposition").
- The 16 pages comprising Exhibit B, Bates Numbered FB-CA_MDL-00213424- FB-CA_MDL-00213439 to Plaintiffs' Opposition designated by Facebook, Inc. ("Facebook") as "Confidential" pursuant to the Protective Order.
- The 13 pages comprising Exhibit D, Bates Numbered FB-CA-MDL-01151469 to Plaintiffs' Opposition designated by Facebook as "Confidential" pursuant to the Protective Order.
- The two pages comprising Exhibit E, Bates Numbered PwC_CPUP_FB00030737 - PwC_CPUP_FB00030738 to Plaintiffs' Opposition designated by PriceWaterhouseCoopers LLP as "Highly Confidential – Attorneys' Eyes Only" pursuant to the Protective Order.

5. Attached hereto as Exhibit 1 is Plaintiffs' Opposition in unredacted form.

6. Attached hereto as Exhibit 2 is Plaintiffs' Opposition in redacted form.

7. Attached hereto as Exhibit 3 is Exhibit B to Plaintiffs' Opposition in unredacted form.

8. Attached hereto as Exhibit 4 is Exhibit B Plaintiffs' Opposition in redacted form.

9. Attached hereto as Exhibit 5 is Exhibit D to Plaintiffs' Opposition in unredacted form.

10. Attached hereto as Exhibit 6 is Exhibit D to Plaintiffs' Opposition in redacted form.

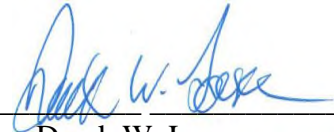
11. Attached hereto as Exhibit 7 is Exhibit E to Plaintiffs' Opposition in unredacted form.

12. Attached hereto as Exhibit 8 is Exhibit E to Plaintiffs' Opposition in redacted form.

I declare under penalty of perjury under the laws of the United States and the State of Washington that the foregoing is true and correct and to the best of my knowledge. This declaration was executed in Seattle, Washington.

Date: September 28, 2020

By: _____


Derek W. Loeser